

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CRIMINAL DIVISION

UNITED STATES OF AMERICA,

CASE NO. 00-6040-CR-ZLOCH

Plaintiff,
vs.

DERRICK ANDERSON,

Defendants.



DEFENDANT'S MOTION TO CONTINUE SENTENCING

Defendant, DERRICK ANDERSON, by and through undersigned counsel, respectfully moves this Honorable Court to continue the sentencing scheduled for Friday, July 21, 2000, at 10:30 a.m., and in support thereof would show:

1. Upon preparing for sentencing, counsel realized that this matter is scheduled for sentencing when counsel is in Philadelphia, Pennsylvania. Counsel visits his son once over the summer. He is presently scheduled to visit on Friday and Saturday, July 21 and 22, 2000. These are the only dates authorized by camp for visitation during the eight (8) week period.
2. Counsel apologizes for having missed this scheduling conflict when the initial order came in. Counsel would appreciate the Court



rescheduling this matter to another date in time, so that he can maintain his travel plans.

3. The Defendant is in compliance with all of the terms of pre-trial release. The sentencing is not expected to be a lengthy one, nor is it one that is expected to involve any complicated issues of law or fact.

4. Contact has been made with Assistant U.S. Attorney Terrence Thompson who has no objection to the Defendant's motion to reschedule the sentencing.

5. Counsel is available on Monday, July 24, 2000, and throughout the entire month of August, subject to the Court's calendar and availability.

6. This motion is presented in good faith and not interposed for delay.

WHEREFORE, Defendant, DERRICK ANDERSON, respectfully moves this Honorable Court for a continuance of the sentencing date scheduled for Friday, July 21, 2000, at 10:30 a.m.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 8th day of June, 2000, to TERRENCE J. THOMPSON, ASSISTANT U.S. ATTORNEY, United States Attorney's Office, 299 East

Broward Boulevard, Fort Lauderdale, Florida 33301; KENNETH P. HASSETT, ESQ., Hassett & Associates, P.A., Attorney for Defendant Dairel Worrell, 201 Sevilla Avenue, Suite 202, Coral Gables, Florida 33134; and ALVIN ENTIN, ESQ., Attorney for Ricardo James, 200 East Broward Boulevard, Suite 1210, Fort Lauderdale, Florida 33301.

TED CRESPI, P.A.
Attorney for Defendant
Prudential Plaza, Suite 218
1776 North Pine Island Road
Plantation, Florida 33322
Tele: (954) 475-7111
Fax: (954) 475-7211

By: _____


TED CRESPI, ESQUIRE
Florida Bar No. 437689